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April 6, 2012

Via Facsimile
Hon. Robert P. Patterson, Jr., U.S.D.J.
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Michael Cacoperdo v. Hartford Life Insurance Company

Civ. Act. No. 10-civ-07847 (RPP) SDMA File No.: 02489-000101

Dear Judge Patterson:



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/6/12

This office represents the defendant Hartford Life Insurance Company ("Hartford") in the above-referenced matter. We write on behalf of all parties to respectfully request that the Court enter a scheduling order for the filing of competing motions for summary judgment as follows:

Date	Description
June 1, 2012	Last day for parties to serve and file initial motion papers
June 22, 2012	Last day for parties to serve and file opposition to initial motion papers
July 12, 2012	Last day for parties to serve and file reply papers in response to opposition

In connection with this request, we also ask that the Court amend the memo endorsed scheduling order dated February 23, 2012 to extend the parties' time to serve dispositive motions from April 27, 2012 to June 1, 2012, as noted above. We also request that the trial date be adjourned sine die as both parties intend to file motions for summary judgment. This would be the third amendment to the initial scheduling order. None of the prior requests were denied by the Court. Plaintiff joins in this application for the foregoing modifications to the prior scheduling orders and this letter is being jointly submitted on behalf of all parties.

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Thank you for your consideration of this matter.

Respectfully submitted,

Michael H. Bernstein

Sedgwick LLP

cc: Jason A. Newfield, Esq.

Attorneys for Plaintiff